

**THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

SS&C Technologies Holdings, Inc.,

*Plaintiff,*

v.

AIG Specialty Insurance Company,

*Defendant.*

Civil Action No. 19-cv-07859 (JSR)

**ORAL ARGUMENT REQUESTED**

**PLAINTIFF'S PRELIMINARY PRETRIAL  
DISCLOSURES PURSUANT TO FED. R. CIV. P. 26(a)(3)**

Plaintiff SS&C Technologies Holdings, Inc. (“SS&C”), pursuant to Fed. R. Civ. P. 26(a)(3) and Judge Rakoff’s Individual Practices Rule 4(a), hereby makes the following disclosures.

**I. Rule 26(a)(3)(A)(i) – SS&C’s Preliminary Trial Witness List**

At this time, SS&C identifies the following witnesses for trial:

	<b>WITNESS, employer</b>	<b>WILL CALL</b>	<b>MAY CALL</b>	<b>ADDRESS</b>
1.	Christopher Wolfe, AIG Specialty Insurance Company (“AIG”)	X		175 Water Street, 7th Floor, New York, NY 10038, (212) 458-1418
2.	Kris Ann Cappelluti, AIG	X		175 Water Street, 7th Floor, New York, NY 10038, (212) 458-6225

3.	AIG's Corporate Representative(s) at trial; AIG	X		
4.	Jeffrey Kalustian (by deposition), AIG		X	99 High Street, 25th Floor, Boston, MA 02110, (617) 235-7910
5.	SS&C's Corporate Representative at trial, SS&C	X		
6.	Paul Igoe (by deposition), Excelitas Technologies (formerly SS&C)		X	3 Pine Tree Lane, Lincoln, RI 02865 (781) 522-5958
7.	Thomas Martocci (by deposition), SS&C		X	80 Lamberton Road, Windsor, CT 06095, (860) 298-4660
8.	Matthew Balemian (by deposition), SS&C		X	80 Lamberton Road, Windsor, CT 06095, (860) 298-4881

SS&C reserves the right to modify, amend, or supplement this list prior to or during trial based on case developments, including but not limited to the right to: (1) not call some of the witnesses listed above, (2) call some of the witnesses above by prior trial testimony, (3) call live or by deposition as its witnesses at trial any witness identified on AIG's witness list, (4) call live any witnesses necessary to authenticate or lay the foundation for the introduction of documents to which AIG objects, (5) add additional witnesses to testify live or by prior trial testimony, or by deposition, (6) introduce deposition testimony or prior trial testimony as impeachment evidence or in rebuttal, or (7) change a witness from a live witness to a witness testifying by prior trial testimony, (8) change a witness from a live witness to a witness testifying by deposition, and vice versa. Plaintiffs further reserve the right to supplement or modify this list (1) if any further depositions are taken in this matter, or (2) in response to rulings by the Court (including on any motions). Plaintiffs include in this list individuals who may be listed on AIG's witness list without prejudice to its right to object to AIG's presentation of those witnesses at trial, the

admissibility of all or part of those witnesses' testimony, or its right to move for the exclusion of those witnesses' testimony.

**II. Rule 26(a)(3)(A)(ii) – SS&C's Preliminary Deposition Designations**

Name	Begin Page	Begin Line	End Page	End Line	Notes (partial line designations; exhibits introduced)
<b>Jeffrey Kalustian</b>	5	18	5	20	
	8	18	10	24	
	29	9	29	13	Discussing Kalustian Ex. 3, the Underwriting Analysis (AIG- 005796)
	33	13	35	3	
	40	21	41	9	
	49	24	50	5	Discussing Kalustian Ex. 5
	54	21	57	16	Discussing Kalustian Ex. 7 (AIG-ESI- 07678)
	94	12	95	3	
	11	6	11	23	
<b>Matthew Baleman</b>	13	13	14	22	Discussing Ex. 12, the Services Agreement
	20	13	20	23	Discussing Baleman Ex. 13, SS&C's third party complaint
	21	16	22	11	
	44	14	45	22	Discussing Baleman Ex. 19 (SS&C- COV- 0041989)

	49	12	50	22	
<b>Thomas Martocci</b>	5	19	6	7	
	8	8	8	16	
	18	19	18	23	
	11	5	12	6	
	21	1	21	11	
<b>Paul Igoe</b>	14	3	14	21	
	52	20	53	6	Discussing Ex. 4, the Denial Letter
	61	6	62	5	

Plaintiff reserves the right to supplement or modify these designations, including, but not limited to, the right to supplement this list with additional deposition designations for witnesses on AIG's "will call" witness list who are not called to testify at trial. Plaintiff also reserves the right to reduce the amount of designated testimony for any listed witness for any reason.

### **III. Rule 26(a)(3)(A)(iii) – SS&C's Preliminary Trial Exhibit List**

<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Range</b>
PX-001	SS&C Policy No. 01-274-16-88 from 4/30/2015 to 4/30/2016	AIG-000001 - AIG-000131
PX-002	Email from A. Roxland (AON) to SS&C Claims re Notice - SS&C (Tillage Commodity Fund - Wire) E&O (including attachment: Aon Letter to AIG re Tillage Commodity Fund Fraudulent Wire Transfer)	AIG-000132 - AIG-000136
PX-003	Summary of SS&C Policy No. 01-274-16-88	AIG-000137 - AIG-000141
PX-004	Letter from B. Conlin (AIG) to A. Roxland (AON) re SS&C Claim No. 9774577298US	AIG-000291
PX-005	Email from L. Raymond (AIG) to P. Igoe (SS&C) re 9774577298US Tillage Commodity Fund - Wire (including attachment: Letter from AIG to SS&C)	AIG-000295 - AIG-000298
PX-006	Email chain from M. Brandi (AIG) to P. Igoe (SS&C) re Notice - SS&C (Tillage Commodity Fund - Wire) - Crime - Claim No.	AIG-000302 - AIG-000303

PX-007	Email Chain from K.A. Cappelluti (AIG) to FL-DropFile re SS&C Claim Number 9774577298US	AIG-000371 - AIG-000377
PX-008	Letter from K.A. Cappelluti (AIG) to P. Igoe (SS&C) re Claim No. 9774577298US	AIG-000382 - AIG-000388; AIG-ESI-00060 - AIG-ESI-00065
PX-009	Email chain from K.A. Cappelluti (AIG) to FL-DropFile re Claimant: Tillage Commodity - AIG Claim 9774577298us (including attachment: Air Letter to P. Igoe)	AIG-000395 - AIG-000401
PX-010	Email chain from K.A. Cappelluti (AIG) to FL-DropFile re Claimant: Tillage Commodity (including attachment: AIG Letter to P. Igoe)	AIG-000402 - AIG-000409
PX-011	Email chain from K.A. Cappelluti (AIG) to FL-DropFile re SS&C Claim Number 9774577298US forwarding M. Kelly November 17, 2016 email chain	AIG-000481 - AIG-000486
PX-012	Email Chain from K.A. Cappelluti (AIG) to FL-DropFile re SS&C Claim Number 9774577298US (including attachment: Order on SS&C Motion to Dismiss dated 12/30/2016, Tillage Commodities Fund L.P. v. SS&C Technologies, Inc., Index No. 654765/2016, Supreme Court of New York)	AIG-000497 - AIG-000509
PX-013	Email Chain from K.A. Cappelluti (AIG) to FL-DropFile re 9774577298US FW: mediation	AIG-000699
PX-014	Email chain from K.A. Cappelluti (AIG) to FL-DropFile re Tillage v. SS&C -- Claim Number 9774577298US forwarding M. Kelly Jun 4, 2017 email chain	AIG-000724 - AIG-000725
PX-015	Email Chain from K.A. Cappelluti (AIG) to FL-DropFile re Tillage v. SS&C -- Claim Number 9774577298US	AIG-000845
PX-016	Email Chain from K.A. Cappelluti to M. Kelly and P. Spagnoletti re Tillage Settlement Discussion AIG Claim 9774577298us	AIG-000905 - AIG-000906; SS&C-COV-0046270 - SS&C-COV-046271
PX-017	Email Chain from K.A. Cappelluti (AIG) to FL-DropFile re 9774577298US FW: Tillage Commodities-SS&C	AIG-000907 - AIG-000908
PX-018	Affirmation and Exhibits in Support of SS&C Technologies, Inc.'s Amended Third-Party Complaint and Opposition to Third-Party Defendants' Motion to Dismiss (Docket. No. 75, Tillage Commodities Fund L.P. v. SS&C Technologies, Inc., Index No. 654765/2016,	AIG-001473 - AIG-001488

	Supreme Court of New York)	
PX-019	Agreement to Provide Administration Services between SS&C Technologies, Inc. and Tillage Commodities Management, LLC	AIG-001476 - AIG-001488
PX-020	Reply Memorandum of Law in Further Support of Third-Party Defendants Tillage Commodities, LLC and Tillage Commodities Management, LLC's Motion to Dismiss the Amended Third-Party Complaint (Docket. No. 82, Tillage Commodities Fund L.P. v. SS&C Technologies, Inc., Index No. 654765/2016, Supreme Court of New York)	AIG-001845 - AIG-001862
PX-021	Email Chain from K.A. Cappelluti (AIG) to J. White (SS&C) re SS&C Claim Number 9774577298US	AIG-002136 - AIG-002138
PX-022	Expert Report of Raymond O'Neill (Tillage Commodities Fund L.P. v. SS&C Technologies, Inc., Index No. 654765/2016, Supreme Court of New York)	AIG-002330 - AIG-002367
PX-023	Affidavit of Matthew Balemian (Docket. No. 141, Tillage Commodities Fund L.P. v. SS&C Technologies, Inc., Index No. 654765/2016, Supreme Court of New York)	AIG-002722 - AIG-002727
PX-024	Affidavit of Thomas Martocci (Docket. No. 170, Tillage Commodities Fund L.P. v. SS&C Technologies, Inc., Index No. 654765/2016, Supreme Court of New York)	AIG-002754 - AIG-002763
PX-025	Davis Polk Presentation titled "Tillage Commodities Fund v. SS&C Technologies, Analysis of Mock Trial"	AIG-003041 - AIG-003057
PX-026	Email Chain from K.A. Cappelluti (AIG) to FL-DropFile re 9774577298US FW: SS&C v. Tillage	AIG-003103 - AIG-003106
PX-027	Email Chain from K.A. Cappelluti (AIG) to FL-DropFile re Insured: SS&C Technologies / Tillage Commodity Fund - 9774577298US forwarding Seligman July 9, 2019 email chain	AIG-003146 - AIG-003159
PX-028	Email Chain from K.A. Cappelluti (AIG) to FL-DropFile re Tillage: Claim Number 9774577298 US/Settlement forwarding Wolfe March 18, 2019 email chain	AIG-003205 - AIG-003209

PX-029	Email Chain from K.A. Cappelluti (AIG) to FL-DropFile re Tillage: Claim Number 9774577298 US/Settlement	AIG-003227 - AIG-003229
PX-030	Email Chain from K.A. Cappelluti (AIG) to FL-DropFile re Insured: SS&C Technologies / Tillage Commodity Fund - 9774577298US forwarding Wolfe May 22, 2019 email chain	AIG-003284 - AIG-003297
PX-031	Email from K.A. Cappelluti (AIG) on behalf of K.A. Cappelluti to FL-DropFile re SS&C Claim Number 9774577298US forwarding Meyer June 26, 2017 email (including attachment: June 22, 2017 Order on Motion to Dismiss in the Tillage Commodities Fund L.P. v. SS&C Technologies, Inc., Index No. 654765/2016 action)	AIG-003479 - AIG-003485
PX-032	Memorandum of Law in Opposition to Motion to Dismiss (Docket. No. 10, Tillage Commodities Fund L.P. v. SS&C Technologies, Inc., Index No. 654765/2016, Supreme Court of New York)	AIG-003612 - AIG-003642
PX-033	Email Chain from K.A. Cappelluti (AIG) on behalf of K.A. Cappelluti to FL-DropFile re 9774577298US FW: Tillage negotiations forwarding Igoe August 14, 2017 email	AIG-004088
PX-034	Email Chain from K.A. Cappelluti (AIG) on behalf of K.A. Cappelluti to FL-DropFile re SS&C Claim Number 9774577298US forwarding Wolfe June 18, 2018 email chain	AIG-004090 - AIG-004093
PX-035	Email Chain from K.A. Cappelluti (AIG) on behalf of K.A. Cappelluti to FL-DropFile re SS&C Claim Number 9774577298US forwarding Wolfe June 19, 2018 email chain	AIG-004094 - AIG-004097
PX-036	Email Chain from K.A. Cappelluti (AIG) on behalf of K.A. Cappelluti to FL-DropFile re SS&C Claim Number 9774577298US forwarding Kelly February 1, 2019 email chain	AIG-004100 - AIG-004105
PX-037	Email Chain from K.A. Cappelluti (AIG) on behalf of K.A. Cappelluti to FL-DropFile re SS&C Claim Number 9774577298US forwarding Cruz June 26, 2018 email chain	AIG-004168 - AIG-004172
PX-038	Email Chain from K.A. Cappelluti (AIG) to FL-DropFile re Tillage: Claim Number 9774577298 US/Settlement forwarding Wolfe March 18, 2019 email chain	AIG-004178 - AIG-004181

PX-039	Email Chain from K.A. Cappelluti (AIG) to FL-DropFile re 9774577298US FW: Tillage Commodities-SS&C forwarding Kelly April 20, 2017 email chain	AIG-004182 - AIG-004185
PX-040	Email Chain from K.A. Cappelluti (AIG) to FL-DropFile re 9774577298US FW: Tillage forwarding Spagnoletti September 18 2017 email chain	AIG-004243 - AIG-004245
PX-041	Email Chain from K.A. Cappelluti (AIG) on behalf of K.A. Cappelluti to FL-DropFile re [EXTERNAL] RE: Tillage: Claim Number 9774577298 US forwarding Wolfe April 2, 2019 email chain	AIG-004254 - AIG-004261
PX-042	Email Chain from K.A. Cappelluti (AIG) on behalf of K.A. Cappelluti to FL-DropFile re Tillage: Claim Number 9774577298 US forwarding Kelly February 27, 2019 email chain	AIG-004308 - AIG-004309
PX-043	Email Chain from K.A. Cappelluti (AIG) to FL-DropFile re 9774577298US FW: Tillage Commodities-SS&C forwarding Wolfe April 21, 2017 email chain	AIG-004314 - AIG-004320
PX-044	Email Chain from K.A. Cappelluti (AIG) on behalf of K.A. Cappelluti to FL-DropFile re 9774577298US FW: Tillage forwarding Wolfe August 2, 2017 email chain	AIG-004353 - AIG-004356
PX-045	Davis Polk Memorandum to K.A. Cappelluti re Tillage Commodities Fund L/P/ v. SS&C Technologies , Inc. Agreed-to-Litigation Plan	AIG-004463 - AIG-004472
PX-046	4/30/2015 - 4/30/2016 Choice of Counsel Request 2015	AIG-005196 - AIG-005200
PX-047	Email Chain from A. Peacock (AIG) to J. Kalustian (AIG) re SS&C (Update on Bradshaw matter)	AIG-005264 - AIG-005265
PX-048	Email Chain from M. Trokenheim (AIG) to J. Kalustian (AIG) re SS&C (Choice of Counsel Endorsement Request for 2015-2016 Manuscript Policy) (Including attachment: Choice of Panel or Scheduled Counsel Endorsement)	AIG-005272 - AIG-005276
PX-049	Email Chain from J. Niemczyk (AIG) to J. Kalustian (AIG) re SS&C Software Renewal 2015-2016	AIG-005281 - AIG-005283
PX-050	Email Chain from J. Marshall-Tate (Willis Americas Administration) to J. Kalustian (AIG) re SS&C	AIG-005458 - AIG-005459; AIG-ESI-07681 - AIG-ESI-07682

PX-051	AIG Specialty Risk Protector Specialty Professional Liability Insurance (SPL)	AIG-005531 - AIG-005535
PX-052	Chart Summarizing SS&C Policy Expiring 4/30/2016	AIG-005691 - AIG-005694
PX-053	Letter from AIG to SS&C re Conditional Renewal Notice	AIG-005718 - AIG-005719
PX-054	AIG Letter to J. Marshall-Tate (Willis of Connecticut, LLC) re Cover Note Evidencing Insurance Placement Confirmation	AIG-005721 - AIG-005722
PX-055	AIG Loss Run Report	AIG-005778 - AIG-005793
PX-056	4/30/2015-4/30/2016 Underwriting Analysis	AIG-005796 - AIG-005812
PX-057	AIG Claims (U.S.) - Claims Handling Standards	AIG-005919 - AIG-006001
PX-058	AIG property & Casualty Claims Handling Guidelines Issued on 7/2/2013	AIG-006002 - AIG-006017
PX-059	AIG Property & Casualty Claims Handling Policy Issued on 7/2/2013	AIG-006018 - AIG-006025
PX-060	Miscellaneous Professional Liability (MPL) Underwriting Methodology	AIG-006029 - AIG-006079
PX-061	Letter from AON to AIG re Tillage Commodity Fund - Wire	AIG-006080 - AIG-006082
PX-062	Letter from AIG to P. Igoe (SS&C) re Tillage Commodity Fund - Wire	AIG-006083 - AIG-006085
PX-063	Letter from AIG to P. Igoe (SS&C) re Claim 9774577298 US	AIG-006086 - AIG-006092
PX-064	Complaint (Docket. No. 2, Tillage Commodities Fund L.P. v. SS&C Technologies, Inc., Index No. 654765/2016, Supreme Court of New York)	AIG-006098 - AIG-006123
PX-065	Third-Party Summons and SS&C's Third-Party Complaint against Tillage (Docket. No. 40, Tillage Commodities Fund L.P. v. SS&C Technologies, Inc., Index No. 654765/2016, Supreme Court of New York)	AIG-006124 - AIG-006153
PX-066	Notes of Claim from 4/7/2016 to 8/28/2019	AIG-006154 - AIG-006163
PX-067	Letter from K.A. Cappelluti (AIG) to P. Igoe (SS&C) re Claim No. 9774577298US	AIG-ESI-00034 - AIG-ESI-00040
PX-068	Affidavit of Chris Prettyman (Tillage Commodities Fund L.P. v. SS&C Technologies, Inc., Index No. 654765/2016, Supreme Court of New York)	AIG-ESI-00082 - AIG-ESI-00084
PX-069	Draft of Letter from K.A. Cappelluti (AIG) to P. Igoe (SS&C) re Claim No. 9774577298US	AIG-ESI-00105 - AIG-ESI-00110

PX-070	AIG Letter to P. Igoe re Claim 9774577298US	AIG-ESI-00111 - AIG-ESI-00116
PX-071	SS&C Statement of Material Facts (Tillage Commodities Fund L.P. v. SS&C Technologies, Inc., Index No. 654765/2016)	AIG-ESI-00147 - AIG-ESI-00158
PX-072	Email Chain from K.A. Cappelluti (AIG) to C. Wolfe (AIG) re SS&C	AIG-ESI-00769 - AIG-ESI-00770
PX-073	Email from K.A. Cappelluti to FL-DropFile re PLEASE DISREGARD PREVIOUS ATTACHMENT. AIG Claim 9774577298us - Claimant: Tillage Commodity (including attachment: AIG Letter to P. Igoe re Claim 9774577298US)	AIG-ESI-00785 - AIG-ESI-00792
PX-074	Email Chain from K.A. Cappelluti (AIG) to FL-DropFile re forwarding email from C. Wolfe to P. Igoe re SS&C-Claim Number 9774577298US (Tillage Matter)	AIG-ESI-00851 - AIG-ESI-00852
PX-075	Email from K.A. Cappelluti (AIG) to C. Wolfe (AIG)re SS&C (including attachment: AIG Letter to P. Igoe re Claim 9774577298US)	AIG-ESI-00874 - AIG-ESI-00880
PX-076	Email from K.A. Cappelluti (AIG) to D. Ruhlman (AIG) re SS&C Technologies Inc. Claims Update	AIG-ESI-01533 - AIG-ESI-01536
PX-077	Decision and Order on Motion to Dismiss (Tillage Commodities Fund L.P. v. SS&C Technologies, Inc., Index No. 654765/2016, Supreme Court of New York)	AIG-ESI-01675 - AIG-ESI-01680
PX-078	Email Chain from C. Wolfe to K.A. Cappelluti re SS&C Claim Number 9774577298US	AIG-ESI-01747 - AIG-ESI-01749
PX-079	Email Chain from C. Wolfe to K.A. Cappelluti (AIG) re Tillage v. SS&C: Claim Number 9774577298 US	AIG-ESI-01812 - AIG-ESI-01814
PX-080	Email Chain from K.A. Cappelluti (AIG) to C. Wolfe re SS&C Claim Number 9774577298US	AIG-ESI-02118 - AIG-ESI-02124
PX-081	Email Chain from K.A. Cappelluti to P. Igoe re Tillage	AIG-ESI-03029; SS&C-COV-0046238
PX-082	Email from K.A. Cappelluti (AIG) to D. Ruhlman (AIG) re SS&C Technologies Inc. Claims Update	AIG-ESI-03076 - AIG-ESI-03078
PX-083	Email from A. Duque to K.A. Cappelluti (AIG) re SS&C Technologies Inc. Claims Update	AIG-ESI-03203 - AIG-ESI-03204
PX-084	Email Chain from P. Spagnoletti to C. Wolfe and K.A. Cappelluti (AIG) re Tillage: Claim Number 9774577298 US/Settlement	AIG-ESI-03308 - AIG-ESI-03310

PX-085	Email Chain from A. Roxland to C. Wolfe (AIG) and K.A. Cappelluti re SS&C Claim Number 9774577298US	AIG-ESI-03887 - AIG-ESI-03891
PX-086	Email Chain from K.A. Cappelluti (AIG) to G. Sligman re SS&C Technologies/Tillage Commodity Fund - 9774577298US	AIG-ESI-03971 - AIG-ESI-03982
PX-087	Email Chain from K.A. Cappelluti to P. Spagnoletti re AIG Claim 9774577298us - Claimant: Tillage Commodity	AIG-ESI-05184 - AIG-ESI-05186
PX-088	Email from P. Igoe (SS&C) to K.A. Cappelluti (AIG) re Tillage Negotiations	AIG-ESI-05431; SS&C-COV-0046237
PX-089	Email Chain from C. Wolfe (AIG) to K.A. Cappelluti (AIG) re [EXTERNAL] Re: Tillage: Claim Number 9774577298 US	AIG-ESI-05702 - AIG-ESI-05707
PX-090	Email from C. Wolfe (AIG) to A. Roxland and K.A. Cappelluti (AIG) re SS&C Claim Number 9774577298US	AIG-ESI-05954 - AIG-ESI-05956; AIG-ESI-10751 - AIG-ESI-10753
PX-091	Email Chain from C. Wolfe to K.A. Cappelluti (AIG) re Tillage Commodities-SS&C	AIG-ESI-06029 - AIG-ESI-06033
PX-092	Email Chain from A. Roxland (AON) to R. Lindsley re 9774577298US Tillage Commodity Fund - SS&C	AIG-ESI-06221 - AIG-ESI-06222
PX-093	Email Chain from K.A. Cappelluti (AIG) to C. Wolfe (AIG) re SS&C/Tillage - AIG Claim #9774577298US	AIG-ESI-06668 - AIG-ESI-06669
PX-094	Email Chain from K.A. Cappelluti (AIG) to G. Seligman re Insured: SS&C Technologies / Tillage Commodities Fund - 9774577298US	AIG-ESI-06673 - AIG-ESI-06683
PX-095	Email Chain from C. Wolfe to K.A. Cappelluti (AIG) re Tillage	AIG-ESI-06788 - AIG-ESI-06790
PX-096	Email Chain from M. Kelly (Davis Polk) to C. Wolfe and K.A. Cappelluti (AIG) re SS&C Claim Number 9774577298US	AIG-ESI-06796 - AIG-ESI-06801
PX-097	Draft of AIG Specialty Risk Protector Specialty Professional Liability Insurance (SPL)	AIG-ESI-07230 - AIG-ESI-07234
PX-098	Draft of 4/30/2015-4/30/2016 Underwriting Analysis	AIG-ESI-07406 - AIG-ESI-07422
PX-099	Draft of 4/30/2015-4/30/2016 Underwriting Analysis	AIG-ESI-07426 - AIG-ESI-07442
PX-100	Email chain from J. Marshall-Tate (FINEX North America) to J. Kalustian (AIG) re SS&C	AIG-ESI-07443 - AIG-ESI-07444
PX-101	Email from S. Krusko (AIG) to J. Kalustian (AIG) re SS&C (4/30/2015 Renewal Approval Referral)	AIG-ESI-07678

PX-102	Email from J. Kalustian to A. Peacock re SS&C	AIG-ESI-07707
PX-103	Email Chain from K. Crowley to J. Kalustian to re SS&C	AIG-ESI-07749 - AIG-ESI-07750
PX-104	Email chain from J. Kalustian to J. Niemczyk re SS&C Software Renewal 2015-2016	AIG-ESI-07855 - AIG-ESI-07857
PX-105	Email from J. Kalustian (AIG) to A. Menier (AIG) re SS&C (Renewal Approval Referral)	AIG-ESI-08142
PX-106	Email Chain from A. Roxland (AON) to R. Lindsley re 9774577298US Tillage Commodity Fund - SS&C	AIG-ESI-08221 - AIG-ESI-08222
PX-107	SS&C letter to Hong Kong Police Force re Fraud Report	AIG-ESI-08232
PX-108	Email Chain from A. Roxland to A. Roxland forwarding P. Igie email to R. Reichman dated March 28, 2016 re Tillage/SS&C call	AIG-ESI-08277 - AIG-ESI-08231
PX-109	Email from L. Raymond (AIG) to P. Igoe (SS&C) re 9774577298US Tillage Commodity Fund - Wire	AIG-ESI-08361
PX-110	Email from C. Wolfe (AIG) to C. Wolfe re 2019 Achievements	AIG-ESI-08400 - AIG-ESI-08401
PX-111	Email Chain from C. Wolfe to K.A. Cappelluti re SS&C/Tillage - AIG Claim #9774577298US	AIG-ESI-08806 - AIG-ESI-08807
PX-112	Email from K.A. Cappelluti (AIG) to C. Wolfe re SS&C	AIG-ESI-10213
PX-113	Draft of letter from AIG to P. Igoe re Claim No. 9774577298us (attachment to email from K.A. Cappelluti (AIG) to C. Wolfe re SS&C)	AIG-ESI-10214 - AIG-ESI-10219
PX-114	Email Chain from E. Schoenwolff to C. Wolfe re Notice - SS&C (Tillage Commodities Fund - Wire) E&O	AIG-ESI-10293 - AIG-ESI-10294
PX-115	Email Chain from C. Wolfe (AIG) to E. Schoenwolff re Notice - SS&C (Tillage Commodities Fund - Wire) E&O	AIG-ESI-10731 - AIG-ESI-10732
PX-116	Email Chain from C. Wolfe to K.A. Cappelluti (AIG) re SS&C Claim Number 9774577298US	AIG-ESI-10754 - AIG-ESI-10760
PX-117	Email from A. Roxland (AON) to K.A. Cappelluti (AIG) re SS&C - Tillage	AIG-ESI-10791
PX-118	Email Chain from E. Monfort (AIG) to K.A. Cappelluti (AIG) re SS&C Claim Update	AIG-ESI-11116 - AIG-ESI-11117
PX-119	Email from C. Wolfe (AIG) to K.A. Cappelluti (AIG) re SS&C Claim Number 9774577298US	AIG-ESI-11769 - AIG-ESI-11770
PX-120	Email from C. Wolfe (AIG) to K.A. Cappelluti (AIG) re 9774577298US-001 successfully Re-assigned to KRIS ANN CAPPELLUTI. SS&C Tech/NY	AIG-ESI-12116

PX-121	Email Chain from C. Wolfe (AIG) to K.A. Cappelluti (AIG) re SS&C-Tillage (claim 9774577298US)	AIG-ESI-12117 - AIG-ESI-12118
PX-122	Email Chain from A. Cerroni (SS&C) to T. Funk (Tillage) re Financial Fraud Report (including attachment)	SS&C-COV-0000190 - SS&C-COV-0000203
PX-123	Affidavit of Matthew Balemian (Docket. No. 141, Tillage Commodities Fund L.P. v. SS&C Technologies, Inc., Index No. 654765/2016, Supreme Court of New York)	SS&C-COV-0007766 - SS&C-COV-0007771
PX-124	SS&C's Memorandum of Law in Support of its Motion for Summary Judgment (Docket. No. 137, Tillage Commodities Fund L.P. v. SS&C Technologies, Inc., Index No. 654765/2016, Supreme Court of New York)	SS&C-COV-0007995 - SS&C-COV-0008022
PX-125	Confidential Settlement and Release Agreement between Tillage Commodities Fund L.P., Tillage Commodities , LLC, Tillage Commodities Management, LLC, Tillage General Partner, the Tillage Fund and SS&C Technologies, Inc.	SS&C-COV-0016777 - SS&C-COV-0016788
PX-126	Email Chain from T. Funk (Tillage) to T. Martocci (SS&C) re Today Wire Transfer Requests (including attachments)	SS&C-COV-0022539 - SS&C-COV-0022550
PX-127	Email Chain from SSCIndiaWireGroup to T. Martocci re Nonpriority/Tillage Commodities/Investment Capital/First Republic Bank/1 wire	SS&C-COV-0034618 - SS&C-COV-0034619
PX-128	Email Chain from K.A. Cappelluti to P. Igoe et al re Tillage	SS&C-COV-0046231 - SS&C-COV-0046232
PX-129	Email Chain from K.A. Cappelluti to P. Igoe re Tillage	SS&C-COV-0046239
PX-130	Email Chain from P. Spagnoletti to K.A. Cappelluti (AIG) re Tillage	SS&C-COV-0046323
PX-131	Financial Institution Bond Form (unfilled)	
PX-132	Letter from AIG to P. Igoe (SS&C) re Claim No. 4299248640US (James Bradshaw)	SS&C-COV-0048697 - SS&C-COV-0048702
PX-133	Summary of Davis Polk Invoices to SS&C for professional services from May 2016 to November 2019 in connection with potential claims by Tillage Commodities Management	SS&C-COV-0048946
PX-134	Davis Polk Invoice to SS&C for professional services ending April 30, 2016 in connection with potential claims by Tillage Commodities Management	SS&C-COV-0048947 - SS&C-COV-0048951

PX-135	Davis Polk Invoice to SS&C for professional services ending May 31, 2016 in connection with potential claims by Tillage Commodities Management	SS&C-COV-0048952 - SS&C-COV-0048955
PX-136	Davis Polk Invoice to SS&C for professional services ending June 30, 2016 in connection with potential claims by Tillage Commodities Management	SS&C-COV-0048956 - SS&C-COV-0048959
PX-137	Davis Polk Invoice to SS&C for professional services ending July 31, 2016 in connection with potential claims by Tillage Commodities Management	SS&C-COV-0048960 - SS&C-COV-0048965
PX-138	Davis Polk Invoice to SS&C for professional services ending August 31, 2016 in connection with potential claims by Tillage Commodities Management	SS&C-COV-0048966 - SS&C-COV-0048969
PX-139	Davis Polk Invoice to SS&C for professional services ending September 30, 2016 in connection with potential claims by Tillage Commodities Management	SS&C-COV-0048970 - SS&C-COV-0048976
PX-140	Davis Polk Invoice to SS&C for professional services ending October 31, 2016 in connection with potential claims by Tillage Commodities Management	SS&C-COV-0048977 - SS&C-COV-0048988
PX-141	Davis Polk Invoice to SS&C for professional services ending November 30, 2016 in connection with potential claims by Tillage Commodities Management	SS&C-COV-0048989 - SS&C-COV-0048997
PX-142	Davis Polk Invoice to SS&C for professional services ending December 31, 2016 in connection with potential claims by Tillage Commodities Management	SS&C-COV-0048998 - SS&C-COV-0049007
PX-143	Davis Polk Invoice to SS&C for professional services ending January 31, 2017 in connection with potential claims by Tillage Commodities Management	SS&C-COV-0049008 - SS&C-COV-0049022
PX-144	Davis Polk Invoice to SS&C for professional services ending February 28, 2017 in connection with potential claims by Tillage Commodities Management	SS&C-COV-0049023 - SS&C-COV-0049034
PX-145	Davis Polk Invoice to SS&C for professional services ending March 31, 2017 in connection with potential claims by Tillage Commodities Management	SS&C-COV-0049035 - SS&C-COV-0049044

PX-146	Davis Polk Invoice to SS&C for professional services ending April 30, 2017 in connection with potential claims by Tillage Commodities Management	SS&C-COV-0049045 - SS&C-COV-0049061
PX-147	Davis Polk Invoice to SS&C for professional services ending April 30, 2017 in connection with potential claims by Tillage Commodities Management	SS&C-COV-0049062 - SS&C-COV-0049078
PX-148	Davis Polk Invoice to SS&C for professional services ending May 31, 2017 in connection with potential claims by Tillage Commodities Management	SS&C-COV-0049079 - SS&C-COV-0049097
PX-149	Davis Polk Invoice to SS&C for professional services ending June 30, 2017 in connection with potential claims by Tillage Commodities Management	SS&C-COV-0049098 - SS&C-COV-0049114
PX-150	Davis Polk Invoice to SS&C for professional services ending July 31, 2017 in connection with potential claims by Tillage Commodities Management	SS&C-COV-0049115 - SS&C-COV-0049128
PX-151	Davis Polk Invoice to SS&C for professional services ending August 31, 2017 in connection with potential claims by Tillage Commodities Management	SS&C-COV-0049129 - SS&C-COV-0049139
PX-152	Davis Polk Invoice to SS&C for professional services ending September 30, 2017 in connection with potential claims by Tillage Commodities Management	SS&C-COV-0049140 - SS&C-COV-0049148
PX-153	Davis Polk Invoice to SS&C for professional services ending October 31, 2017 in connection with potential claims by Tillage Commodities Management	SS&C-COV-0049149 - SS&C-COV-0049159
PX-154	Davis Polk Invoice to SS&C for professional services ending November 30, 2017 in connection with potential claims by Tillage Commodities Management	SS&C-COV-0049160 - SS&C-COV-0049175
PX-155	Davis Polk Invoice to SS&C for professional services ending December 31, 2017 in connection with potential claims by Tillage Commodities Management	SS&C-COV-0049176 - SS&C-COV-0049190
PX-156	Davis Polk Invoice to SS&C for professional services ending January 31, 2018 in connection with potential claims by Tillage Commodities Management	SS&C-COV-0049191 - SS&C-COV-0049211

PX-157	Davis Polk Invoice to SS&C for professional services ending February 28, 2018 in connection with potential claims by Tillage Commodities Management	SS&C-COV-0049212 - SS&C-COV-0049228
PX-158	Davis Polk Invoice to SS&C for professional services ending March 31, 2018 in connection with potential claims by Tillage Commodities Management	SS&C-COV-0049229 - SS&C-COV-0049242
PX-159	Davis Polk Invoice to SS&C for professional services ending April 30, 2018 in connection with potential claims by Tillage Commodities Management	SS&C-COV-0049243 - SS&C-COV-0049255
PX-160	Davis Polk Invoice to SS&C for professional services ending May 31, 2018 in connection with potential claims by Tillage Commodities Management	SS&C-COV-0049256 - SS&C-COV-0049274
PX-161	Davis Polk Invoice to SS&C for professional services ending June 30, 2018 in connection with potential claims by Tillage Commodities Management	SS&C-COV-0049275 - SS&C-COV-0049295
PX-162	Davis Polk Invoice to SS&C for professional services ending July 31, 2018 in connection with potential claims by Tillage Commodities Management	SS&C-COV-0049296 - SS&C-COV-0049310
PX-163	Davis Polk Invoice to SS&C for professional services ending August 31, 2018 in connection with potential claims by Tillage Commodities Management	SS&C-COV-0049311 - SS&C-COV-0049314
PX-164	Davis Polk Invoice to SS&C for professional services ending August 31, 2018 in connection with potential claims by Tillage Commodities Management	SS&C-COV-0049315 - SS&C-COV-0049330
PX-165	Davis Polk Invoice to SS&C for professional services ending September 30, 2018 in connection with potential claims by Tillage Commodities Management	SS&C-COV-0049331 - SS&C-COV-0049334
PX-166	Davis Polk Invoice to SS&C for professional services ending September 30, 2018 in connection with potential claims by Tillage Commodities Management	SS&C-COV-0049335 - SS&C-COV-0049351
PX-167	Davis Polk Invoice to SS&C for professional services ending October 31, 2018 in connection with potential claims by Tillage Commodities Management	SS&C-COV-0049352 - SS&C-COV-0049355

PX-168	Davis Polk Invoice to SS&C for professional services ending October 31, 2018 in connection with potential claims by Tillage Commodities Management	SS&C-COV-0049356 - SS&C-COV-0049375
PX-169	Davis Polk Invoice to SS&C for professional services ending November 30, 2018 in connection with potential claims by Tillage Commodities Management	SS&C-COV-0049376 - SS&C-COV-0049379
PX-170	Davis Polk Invoice to SS&C for professional services ending November 30, 2018 in connection with potential claims by Tillage Commodities Management	SS&C-COV-0049380 - SS&C-COV-0049396
PX-171	Davis Polk Invoice to SS&C for professional services ending December 31, 2018 in connection with potential claims by Tillage Commodities Management	SS&C-COV-0049397 - SS&C-COV-0049400
PX-172	Davis Polk Invoice to SS&C for professional services ending December 31, 2018 in connection with potential claims by Tillage Commodities Management	SS&C-COV-0049401 - SS&C-COV-0049415
PX-173	Davis Polk Invoice to SS&C for professional services ending January 31, 2019 in connection with potential claims by Tillage Commodities Management	SS&C-COV-0049416 - SS&C-COV-0049420
PX-174	Davis Polk Invoice to SS&C for professional services ending January 31, 2019 in connection with potential claims by Tillage Commodities Management	SS&C-COV-0049421 - SS&C-COV-0049434
PX-175	Davis Polk Invoice to SS&C for professional services ending February 28, 2019 in connection with potential claims by Tillage Commodities Management	SS&C-COV-0049435 - SS&C-COV-0049438
PX-176	Davis Polk Invoice to SS&C for professional services ending February 28, 2019 in connection with potential claims by Tillage Commodities Management	SS&C-COV-0049439 - SS&C-COV-0049454
PX-177	Davis Polk Invoice to SS&C for professional services ending March 31, 2019 in connection with potential claims by Tillage Commodities Management	SS&C-COV-0049455 - SS&C-COV-0049458
PX-178	Davis Polk Invoice to SS&C for professional services ending March 31, 2019 in connection with potential claims by Tillage Commodities Management	SS&C-COV-0049459 - SS&C-COV-0049473

PX-179	Davis Polk Invoice to SS&C for professional services ending April 30, 2019 in connection with potential claims by Tillage Commodities Management	SS&C-COV-0049474 - SS&C-COV-0049477
PX-180	Davis Polk Invoice to SS&C for professional services ending April 30, 2019 in connection with potential claims by Tillage Commodities Management	SS&C-COV-0049478 - SS&C-COV-0049502
PX-181	Davis Polk Invoice to SS&C for professional services ending June 26, 2019 in connection with potential claims by Tillage Commodities Management	SS&C-COV-0049503 - SS&C-COV-0049506
PX-182	Davis Polk Invoice to SS&C for professional services ending June 26, 2019 in connection with potential claims by Tillage Commodities Management	SS&C-COV-0049507 - SS&C-COV-0049536
PX-183	Davis Polk Invoice to SS&C for professional services ending October 31, 2019 in connection with potential claims by Tillage Commodities Management	SS&C-COV-0049537 - SS&C-COV-0049540
PX-184	Amended Complaint (James Bradshaw, et al v. Stephen Maiden et al, General Court of Justice, Superior Court Division, State of North Carolina, County of Mecklenburg, Docket No. 14-CVS-14445)	
PX-185	Email Chain from C. Wolfe (AIG) to FL-Drop File re Notice - SS&C (Tillage Commodities Fund - Wire) E&O - PLEADING ATTACHED Claim 9774577298US	AIG-ESI-06986 - AIG-ESI-06987
PX-186	Memorandum of Law in Support of Defendant's Motion to Dismiss (Docket. No. 7, Tillage Commodities Fund L.P. v. SS&C Technologies, Inc., Index No. 654765/2016, Supreme Court of New York)	
PX-187	Reply Memorandum of Law in Support of Defendant's Motion to Dismiss (Docket. No. 29, Tillage Commodities Fund L.P. v. SS&C Technologies, Inc., Index No. 654765/2016, Supreme Court of New York)	
PX-188	Letter from AIG to P. Igoe (SS&C) re Claim No. 4299248340US (James Bradshaw)	SS&C-COV-0048693 - SS&C-COV-0048696
PX-189	Memorandum of Law in Opposition to Defendant's Motion for Summary Judgment (Docket. No. 175, Tillage Commodities Fund L.P. v. SS&C Technologies, Inc., Index No. 654765/2016, Supreme Court of New York)	

PX-190	Memorandum of Law in Opposition to Defendant's Motion for Summary Judgment (Docket. No. 188, Tillage Commodities Fund L.P. v. SS&C Technologies, Inc., Index No. 654765/2016, Supreme Court of New York)	
PX-191	Memorandum of Law in Further Support of Tillage Commodities Management, LLC's Motion for Summary Judgment (Docket. No. 214, Tillage Commodities Fund L.P. v. SS&C Technologies, Inc., Index No. 654765/2016, Supreme Court of New York)	
PX-192	SS&C Reply Memorandum of Law in Further Support of Its Motion for Summary Judgment (Docket. No. 218, Tillage Commodities Fund L.P. v. SS&C Technologies, Inc., Index No. 654765/2016, Supreme Court of New York)	
PX-193	SS&C Memorandum of Law in Opposition to Tillage Management's Motion for Summary Judgment (Tillage Commodities Fund L.P. v. SS&C Technologies, Inc., Index No. 654765/2016, Supreme Court of New York)	
PX-194	Reply Memorandum of Law in Further Support of Tillage Commodities Management, LLC Motion for Summary Judgment (Docket. No. 242, Tillage Commodities Fund L.P. v. SS&C Technologies, Inc., Index No. 654765/2016, Supreme Court of New York)	
PX-195	Email Chain from P. Spagnoletti to L. Solbakken re Tillage/Settlement Communication	SS&C-COV-0016821 - SS&C-COV-0016823
PX-196	Stipulation and Order on Settlement (Docket. No. 248, Tillage Commodities Fund L.P. v. SS&C Technologies, Inc., Index No. 654765/2016, Supreme Court of New York)	
PX-197	AIG Specialty Insurance Company's Responses to Plaintiff's First Set of Requests for Admission	
PX-198	Letter from Ryan McCartney to Alex Reisen re Tillage Commodities Fund, L.P. v. SS&C Technologies, Inc. (Index No. 654765/2016)	
PX-199	Summary of Invoices related to Tillage Action	
PX-200	Summary of Invoices related to the instant litigation	
PX-201	Email Chain from P. Spagnoletti to C. Wolfe re Tillage Claim	AIG-ESI-01828-AIG- ESI01829

Plaintiff may introduce some or all of the exhibits on this Exhibit List. Plaintiff reserves the right to supplement or amend their Exhibit List in light of AIG's objections and AIG's list of exhibits. Plaintiff also reserves the right to supplement or amend their Exhibit List based, among other things, on the Court's summary judgment, pre-trial, and trial evidentiary rulings; the ongoing discovery in this action or otherwise; and the arguments and evidence offered by AIG in their case-in-chief. This Exhibit List does not include documents that Plaintiffs may use for cross examination, for impeachment, to refresh recollection, or in rebuttal. This Exhibit List does not include demonstrative exhibits, and Plaintiffs reserve their right to offer into evidence summary, blow-up, handout, or composite exhibits. In addition, Plaintiffs reserve the right to introduce any exhibit on AIG's list of exhibits. The inclusion of exhibits on this Exhibit List does not waive any objections available under the Federal Rules of Evidence or otherwise that Plaintiff may have to the introduction of such exhibit if offered by AIG. The inclusion of any exhibit on this list does not waive and is subject to all motions in limine and motions for summary judgment, which, if granted, may result in the deletion and/or redaction of certain exhibits as appropriate.

Dated: New York, New York  
January 22, 2019

McKOOL SMITH, P.C.

By: /s/ Robin L. Cohen  
Robin L. Cohen  
(rcohen@mckoolsmith.com)  
James H. Smith  
(jsmith@mckoolsmith.com)  
One Bryant Park, 47th Floor  
New York, NY 10036  
Telephone: (212) 402-9400  
Facsimile: (212) 402-9444

*Attorneys for Plaintiff SS&C Technologies Holdings, Inc.*